

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of _____)
_____)
Digital Audio Broadcasting Systems) MM Docket No.99-325
And Their Impact On The Terrestrial)
Radio Broadcast Service

THESE COMMENTS ARE IN RESPONSE TO PUBLIC NOTICE
DA 01-2932 CONCERNING THE NRSC "EVALUATION OF
THE IBiquITY DIGITAL CORPORATION IBOC SYSTEM".

TO: The Commission

COMMENTS OF SUSQUEHANNA RADIO CORP.

These comments are filed in response to the Public Notice DA 01-2932 issued December 19,2002 concerning the NRSC evaluation of the iBiquity Digital Corporation IBOC system. Susquehanna Radio Corp. is a privately held company that has served the public as a radio broadcast licensee for 60 years. Susquehanna owns and operates 12 AM and 20 FM stations.

Susquehanna has been a strong supporter of the In-Band/On-Channel (IBOC) concept since the idea was first conceived. It has long been Susquehanna's belief that IBOC and only IBOC can move radio broadcasting into the digital domain in a timely and orderly fashion with minimal cost and disruption to existing services and most importantly, no need to allocate new spectrum for this service.

Susquehanna personnel participated in the development of the NRSC report and share in its conclusion, "... the iBiquity FM IBOC system as tested will offer FM broadcasters significantly enhanced performance over that which is presently available from traditional analog FM broadcasting". The NRSC report and the December 6, 2001 submission of iBiquity provide an abundance of evidence that IBOC does work and that it works well. Certainly within the pages of these massive submissions shortcomings can be found but, taken in their entirety, these documents show this hybrid IBOC system offers a definite improvement over existing FM in the United States.

In its NPRM released more than two years ago, the commission states that it is initiating this rulemaking to consider alternative approaches of introducing DAB service to the American public and set forth its public policy objectives that will be used to guide it in its deliberations in this proceeding. The commission listed 10 tentative criteria for a proposed DAB system and it is Susquehanna's belief that the iBiquity FM IBOC system meets all of these criteria.

At the time the commission initiated its proceeding there were three different proponents of IBOC systems. These three systems were similar in many ways, but still different, making it difficult to judge the merits of one system against the others. These three proponents have now joined together in the formation of iBiquity Digital Corporation and merged their technologies into a single system. Today, there is but one IBOC system and no known proposals or discussions by any other organization interested in developing a FM IBOC system.

With only one IBOC proponent and no competing IBOC systems in sight, it would appear that the only alternative to the iBiquity IBOC system for DAB in the United States is a new digital service in new spectrum. Although any "new band" system could meet many of the ten criteria set out by the commission, Susquehanna believes that only IBOC can achieve all these criteria, particularly:

Spectrum Efficiency

IBOC requires no new allocation system. Unlike any other potential DAB broadcast service, the frequency and geographic allocations for an IBOC system are already in place. Although the allocations for both the AM and FM bands were developed over many years and, in certain cases, may not be optimum, each of the stations in these services was allocated in a manner that was determined, by the Commission, to serve the public interest. This market-driven distribution of facilities provides service to the entire country in a manner that is in general proportion to population density.

Accommodation for Existing Broadcasters

IBOC by its very nature provides accommodation for all existing broadcasters. Each existing FM broadcaster can enter the digital domain on its own schedule by simply adding the IBOC digital signal to its existing authorized FM facility. The time consuming and painstaking process for the commission to develop a new allocation scheme that would be required for any new band service is simply unnecessary with IBOC.

Implementation cost and affordability of equipment

IBOC DAB systems utilize the existing transmission facilities of existing stations and require no new transmitting sites. Existing FM stations will be required to add and/or modify portions of their transmission facilities but these costs should be minimal when compared to the additional cost of acquiring new transmitting sites and erecting new towers that would be necessary for any new band system. The construction of new towers is an ever-growing concern of both the FAA and local zoning authorities. The public interest will clearly be best served by the development of an IBOC DAB system that requires no new towers or major infrastructure for its broadcast transmission facilities.

The success of the iBiquity IBOC system as demonstrated in the reports now before the commission is a tribute to those who worked so diligently to develop this system which many once believed to be unachievable. Susquehanna looks forward to a positive resolution of the substitution of the PAC algorithm and the further tests to determine the impact on analog SCAs

The opportunity to develop a new transmission service without the need for a new spectrum allocation does not occur often. IBOC, by its inherent design, must use the same spectrum as its analog service. With IBOC, the transition to digital would be the least disruptive to existing FM service and the least demanding on commission resources in insuring that this transition occurs in timely fashion and in the best interest of the public.

Susquehanna urges the commission to take whatever action it deems appropriate to adopt the iBiquity FM IBOC system as the standard form of digital broadcasting for the United States and authorize the commencement of this new service at the earliest possible date.

Respectfully Submitted,

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